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18 Attorneys for Defendant MARINO SANDOVAL

19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA**

21 UNITED STATES OF AMERICA,

22 Plaintiff,

23 v.

24 MARINO SANDOVAL and NICOLE
25 SANDOVAL

26 Defendant.

27 Case No: CR 10-00866 (CW) (DMR)

28 **DEFENDANT MARINO SANDOVAL'S
UNOPPOSED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
CERTAIN DOCUMENTS FILED IN
SUPPORT OF DEFENDANT'S MARINO
SANDOVAL'S MOTION FOR
SEVERANCE**

DATE: JUNE 8, 2011

TIME: 2:30 P.M.

COURTROOM: 2, 4TH FLOOR

Judge: Hon. Claudia Wilken

1 Pursuant to Civil L.R. 7-11 and 79-5, defendant Marino Sandoval (“Mr. Sandoval”)
2 requests that the following document be filed under seal:

3 1. Internal Revenue Service, Criminal Investigation, Memorandum of Interview of
4 Nicole Sandoval on March 13, 2007.

5 The requested relief sought is necessary and narrowly tailored to protect the
6 confidentiality of Mrs. Sandoval’s statements contained in the Internal Revenue Service’s
7 Memorandum of Interview put at issue pursuant to the Motion to Sever the trial of Marino
8 Sandoval filed concurrently herewith. This motion is based on the declaration of Thomas F.
9 Carlucci filed (under seal) concurrently herewith. The government does not oppose this
10 application.

11
12 Dated: May 25, 2011

FOLEY & LARDNER LLP
THOMAS F. CARLUCCI
JAIME GUERRERO

16
17 By: /s/ Thomas F. Calucci
THOMAS F. CARLUCCI

18 Attorneys for Defendant
19 MARINO SANDOVAL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 25, 2011 I, electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to the following:

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/s/ Thomas F. Calucci
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